

**REMARKS**

Claims 1-28 are pending in the above-referenced patent application and are subject to rejection.

Claims 1-3, 6-12, 15-22 and 25-28 were finally rejected under 35 USC 102(e) as being anticipated by USPN 6,032,202 to Lea et al ("Lea"). Rejection of Claims 1-3, 6-12, 15-22 and 25-28 is respectfully traversed because Lea does not disclose all of the limitations of the claims. Claims 4, 5, 13, 14, 23 and 24 were rejected under 35 USC 103(a) as being unpatentable over Lea in view of USPN 5,956,487 to Venkatraman et al ("Venkatraman").

This Amendment is being filed within the shortened statutory period, and no extension fee is due.

Please charge any additional fees to our Deposit Account No. 01-1960. One copy of this letter is enclosed for such purpose.

**TELEPHONIC INTERVIEW**

Applicant wishes to thank the Examiners for the interview of June 18, 2003, in which the above rejections were discussed with Applicants Associate Attorney, Michael Zarrabian. The interview first focused on rejections of the claims under Lea. It was brought to the attention of

the Patent Office that Lea does not provide a user interface description as claimed. And that, even if Lea can be somehow construed to provide a user interface description, Lea does not disclose that such a user interface description includes “one or more references associated with the device information of one or more devices currently connected to the network”, as required by Claim 1, for example. It was further discussed that Lea does not disclose that each reference includes at least one link to information contained in an associated device currently connected to the network, as required by Claim 1. And that Lea does not teach the concept of using links in the user interface description, wherein the links provide access to information stored in devices connected to the network.

It was further discussed that unlike Lea, in the present invention rather than initially transferring the user interface data contained in each network device and storing each device’s transferred user interface data in a general user interface description, links are included in the user interface description, wherein each link refers to the user interface data of a device connected to the network. When the user interface data of a particular device is needed (e.g., for display to a user for command and control), then a link in the general user interface description, corresponding to that particular device, is used to access that particular device’s user interface data for display to a user, allowing command/control of the particular device via that user interface.

The Patent Office interpreted the words “reference” and “link” in the claims to mean any type of relationship between the user interface description and the user interface data that is stored in the device networks. As per Venkatraman in relation to Claims 4 and 5, the Patent Office interprets hyper-text links 66-68 in Venkatraman can be used to access the printer device information that currently connects to the network. The claims have been amended herein under 37 CFR 116, to further clarify the patentable differences between the claimed invention and the references.

**Rejection of Claims Under 35 USC 102(e)**

Rejection of Claims 1-3, 6-12, 15-22 and 25-28 under 35 USC 102(e) as being anticipated by Lea is respectfully traversed because Lea does not disclose all of the limitations of the claims. Further, the claims have been amended to specify that the information in each device includes device information for user interaction with that device. Further, the amendments specify that a reference in a user interface description includes an electronic link that provides direct access to the device information in a corresponding device. The amendments further specify that a link can be a hyper-text link that when activated provides access to the corresponding device information.

Applicant would like to point out that though the claims have been amended to further clarify “link”, such amendments do not constitute new matter in the claims and the amendments

should be entered. This is because as those skilled in the art will recognize, and according to the specification, the term “link” is used to indicate an electronic link including a pointer that provides direct access from one document or resource to another document or resource. A hypertext link is an example of a link. The Patent Office can check any programming or computer related source to confirm that “link” has a specific meaning that does not lend itself to such broad definition as the Patent Office has adopted. For example, in the Office Action, in paragraph (a) on page 11, the Patent Office interprets icons in FIGS. 12A-12B of Lea representing an appliance, to be a user interface description including links as claimed herein. As such, the Patent Office interprets Lea’s user interfaces for the devices to be references or links to those devices. For the above reasons, this interpretation of Lea is respectfully traversed. Lea’s icons or menus are not user interface description including links as claimed herein.

As per paragraph (b) on page 12 of the Office Action, it is respectfully submitted that Lea transfers the user interface data contained in each network device and stores each device’s transferred user interface data in a general user interface, whereas in the present invention links are included in the user interface description, wherein each link refers to the user interface data of a device connected to the network. The links are used to obtain information from the corresponding devices, as claimed, and are not static representations of the devices such as Lea’s icons.

Further, the hyper-text links 66-68 in Venkatraman are not hyper-text links associated with the device information in each of said devices currently connected to the network, such that when each hyper-text link provides access from the user interface description to the device information in a corresponding device. That device information is for user interaction and/or control of that device. By contrast, Venkatraman states that the hyper-text links 66-68 “direct the web browser 40 to other web pages for various printer support functions. For example, the hyperlink 66 ‘Service Contract’ may be selected by the user with the selection device 44 to direct the web browser 40 to the URL ‘<http://www.hpsc.com>’ for information regarding printer service contracts. Similarly, hyperlinks 67 and 68 provide links to web pages for ordering printer supplies and obtaining information for future printer products from the manufacturer of the printer device 10.” Col. 7, lines 5-14. It is respectfully submitted that the hyperlinks 66-68 are not for access to device information in the devices connected to the network, wherein the device information is for user interaction with and/or control of the devices.

Further, Lea does not disclose a method for providing a user interface for controlling devices that are currently connected to a network, by obtaining information from one or more of the devices currently connected to the network, and then, generating a user interface description based at least on the obtained information, the user interface description including a reference associated with the device information of each of said devices currently connected to the network, such that the reference includes at least one link to information contained in said

devices currently connected to the network, as required by Claim 1.

Specifically, in the Office Action, the Patent Office refers to Lea, col. 3, lines 5-12, and col. 2, lines 57-67, to reject Claim 1. In col. 3, lines 5-12, Lea simply states:

“Through the DCMs of the present invention, over the life time of the AV system, as new devices are added whose capabilities and features are unknown, or only partially known to other devices, a mechanism is provided which guarantees that all devices can be communicated with and controlled at some basic minimal level, and then where possible, as more information is obtained about the device, a better abstraction of the new device is created.”

Despite the Patent Office’s assumption, in the above passage Lea does not disclose the steps of generating a user interface for controlling devices that are currently connected to the network, by obtaining information from one or more of the devices currently connected to the network, as required by Claim 1. Lea mentions a mechanism whereby devices can be communicated with and controlled at some basic minimal level. Indeed, there is no mention of generating a user interface for controlling devices that are currently connected to the network, as claimed herein.

Further, in col. 2, lines 57-67 (referenced by the Patent Office), Lea simply states:

“To implement the above features, the present invention includes an architecture that allows the newly coupled device to be queried. Using the results of the query, a software based abstraction of that device is generated and made available to other elements in the network. The software abstraction is referred to as a device control module. The device control module provides a predefined, standardized, set of interoperability, functionality, and control interfaces for the device. The CE device is coupled to and communicates with the home AV network via a device control module.”

Despite the Patent Office’s assumption, in the above passage Lea does not disclose any of the limitations in step (b) of Claim 1, including: “generating a user interface description based at least on the obtained information”, “the user interface description including a reference associated with the device information of each of said devices currently connected to the network”, “such that the reference includes at least one link to information contained in said devices currently connected to the network”. In col. 2, lines 57-67, Lea only mentions that newly coupled devices are queried, and using the results of the query, a software based abstraction of that device is generated (i.e., device control module or DCM) and made available to other elements in the network. The DCM provides a predefined, standardized, set of interoperability, functionality, and control interfaces for the device. Therefore, Lea does not disclose a user interface description as claimed herein.

Even if Lea can be somehow construed to provide a user interface description, Lea does not disclose that such a user interface description includes a reference associated with the device information of each of said devices currently connected to the network, as required by Claim 1. Nor does Lea disclose that the reference includes at least one link to information contained in said devices currently connected to the network, as required by Claim 1. Lea does not teach the concept of using links in the user interface description, wherein the links provide access to information stored in devices connected to the network.

As such, according to the claimed invention herein, rather than initially transferring the user interface data contained in each network device and storing each device's transferred user interface data in a general user interface description, links are included in the user interface description, wherein each link refers to the user interface data of a device connected to the network. When the user interface data of a particular device is needed (e.g., for display to a user for command and control), then a link in the general user interface description, corresponding to that particular device, is used to access that particular device's user interface data for display to a user, allowing command/control of the particular device via that user interface. Lea does not teach any of said limitations in Claim 1. Therefore, for at least these reasons, Claim 1 and claims dependent therefrom, should be allowed.

As per Claim 2, Lea does not disclose the step of generating the user interface description such that the reference in the user interface description provides access to at least the information in each corresponding device, as required by Claim 2. The Patent Office relies on Lea, col. 3, lines 1-4, to rejection Claim 2. However, in that passage Lea only mentions that the DCM also provides an application programming interface (API) to allow other applications to access and manipulate any newly coupled CE device. As such, Lea does not teach that this API is in a user interface description, as required by Claim 2. Nor does Lea teach that the API provides access to information in a corresponding device for generating a user interface. Indeed, Lea is clearly stating that the API is an *application programming interface* for other *applications* to access and manipulate a device. This has nothing to do with the claimed invention wherein a link for a each device is included in a user interface description, wherein that link is later used to access information such as user interface data in that device to generate a user interface for user interaction with that device. Therefore, for at least these reasons, and the reasons provide above in relation to Claim 1, rejection of Claim 2 should be withdrawn.

As per Claim 3, Lea does not disclose generating the user interface description such that the user interface description further includes device data corresponding to each device based on the information obtained from each device. Again, as discussed, Lea does not disclose the steps of generating any type of user interface description according to the claimed invention.

Therefore, for at least these reasons, and the reasons provided above in relation to Claims 1-2, rejection of Claim 3 should be withdrawn.

As per Claim 6, Lea does not disclose that the device information in each device includes device identification information. In col. 7, lines 20-27, referenced by the Patent Office, Lea does not teach the limitations of Claim 6, and certainly there is no mention of device identification information as claimed herein. Therefore, for at least these reasons, and the reasons provided above in relation to Claims 1-2, rejection of Claim 6 should be withdrawn.

As per Claim 7, Lea does not disclose that the device information in each device includes a user control interface description for user interaction with the device, as required by Claim 7. Further, as discussed, Lea does not disclose the steps of generating any type of user interface description according to the claimed invention. Therefore, for at least these reasons, and the reasons provided above in relation to Claims 1-2, rejection of Claim 7 should be withdrawn.

As per Claim 8, Lea does not disclose generating the user interface description such that each reference in the user interface description is to at least the user control interface description in each corresponding device, as required by Claim 8. As discussed, there is no user interface description generated in Lea. Therefore, for at least these reasons, and the reasons provided above in relation to Claims 1-2 and 7, rejection of Claim 8 should be withdrawn.

As per Claim 9, Lea does not disclose generating the user interface description such that the user interface description further includes device data corresponding to each device based on the information obtained from each device, the device data providing reference to the user control interface description in each device, as required by Claim 9. As discussed, there is no user interface description generated in Lea. Therefore, for at least these reasons, and the reasons provided above in relation to Claims 1-3 and 7-8, rejection of Claim 9 should be withdrawn.

Independent Claim 10 was rejected for substantially the same reasons that the rejection of Claim 1. The rejection of Claim 1 is respectfully traversed for the reasons given above in relation to Claim 1. Further, Applicant believe that Lea does not disclose “an agent” in a device for obtaining information and generating a user interface description as required by Claim 10. Therefore, for at least these reasons, rejection of Claim 10, and all claims dependent therefrom, should be withdrawn.

Claims 11, 12, 15, 16, 17, 18 and 19 were rejected for substantially the same reasons as rejection of Claims 2, 3, 6, 7, 8, 9. The rejection of Claims 11, 12, 15, 16, 17, 18 and 19 is respectfully traversed for the reasons given above in relation to Claims 1, 2, 3, 6, 7, 8, 9 and 10. Further, in regards to Claim 19, Lea does not provide means for generating at least a user interface by: using each reference in a user interface description to access the information in each

corresponding device, and generating the user interface including device data corresponding to each device using the accessed information in each device. Therefore, rejection of Claims 11, 12, 15, 16, 17, 18 and 19 should be withdrawn.

Independent Claim 20 was rejected for substantially the same reasons that the rejection of Claim 10. The rejection of Claim 20 is respectfully traversed for the reasons given above in relation to Claim 10. Further, Applicant believe that Lea does not disclose “an agent” in multiple devices for obtaining information and generating a user interface description as required by Claim 20. Therefore, for at least these reasons, rejection of Claim 20, and all claims dependent therefrom, should be withdrawn.

Claims 21, 22, 25, 26, 27 and 28 were rejected for substantially the same reasons as rejection of Claims 11, 12, 15, 16, 17 and 18. The rejection of Claims 21, 22, 25, 26, 27 and 28 is respectfully traversed for the reasons given above in relation to Claims 10, 11, 12, 15, 16, 17 and 18. Therefore, rejection of Claims 21, 22, 25, 26, 27 and 28 should be withdrawn.

### **Rejection of Claims Under 35 USC 103**

Claims 4, 5, 13, 14, 23 and 24 were rejected under 35 USC 103(a) as being unpatentable over Lea in view of USPN 5,956,487 to Venkatraman et al (“Venkatraman”).

As per Claims 4 and 5, as the Patent Office also states, Lea does not disclose generating the user interface description by associating a hyper-text link with the device information of each of the devices connected to the network, as required by Claim 4. As the Patent Office further acknowledges, Lea does not disclose that the information in each device comprises an HTML page contained in that device, as required by Claim 5.

However, the Patent Office concludes that Venkatraman, col. 3, lines 5-61, discloses such limitations of Claims 4 and 5. Further, the Patent Office proposes a modification of Lea to associate a hyper-text link with the device information of one or more devices in Lea's method since HTML would allow the devices to interface with Internet, from service providers, via HTTP protocol.

Rejection of the claims is respectfully traversed because the references, alone or in combination, do not teach or suggest the claimed limitations. No prima facie case of obviousness has been established.

Lea is directed to a method and system for providing interoperability and integration of a plurality of devices in a network. When a new device is coupled to a home audio video network, the device is queried to obtain a description of first level functions supported by the device, and generate a control module. The device is subsequently accessed via the control module in order

to access its functions and provide interoperability and integration of the device with the plurality of devices in the network. (Abstract).

Venkatraman is directed to Web access functionality embedded in a device to enable low cost widely accessible and enhanced user interface functions for the device. A web server in the device provides access to the user interface functions for the device through a device web page. A network interface in the device enables access to the web page by a web browser such that a user of the web browser accesses the user interface functions for the device through the web page. (Abstract).

Venkatraman, col. 3, lines 5-61 (relied upon by the Patent Office), does not disclose “generating a user interface description” nor does Venkatraman disclose generating such a user interface description by “associating a hyper-text link with the device information of each of said devices currently connected to the network”, as required by Claim 4. Indeed, in col. 3, lines 5-61, Venkatraman simply states that Web access functionality is embedded in a device 10 using web server software for execution by a processor 200. And, as discussed further above, there is no teaching in Venkatraman of associating a hyper-text link with the device information of each of said devices currently connected to the network.

One of ordinary skill in the art would not look to combine Lea and Venkatraman. Nor is

there a motivation or suggestion in either reference to do so. Even if Lea and Venkatraman are combined as suggested by the Patent Office, the result does not teach or suggest the claimed invention. Further, such a combination would simply mean including a web server in each device of Lea. This provides no advantage for the purpose of Lea which is providing interoperability and integration of a plurality of devices in a network. Lea is simply not concerned with, nor is appropriate for, the Patent Office's proposed modification to allow Lea's devices to interface with Internet, from service providers, via HTTP protocol. At any rate, such a modified system does not teach the limitations of Claim 4. Indeed, such a modified system teaches away from the claimed invention herein because

As per Claim 5, Venkatraman does not disclose that the information in each device comprises an HTML page contained in that device. Further, the web server software of Venkatraman does not provide HTML to other devices in a network. Further, as discussed, there is no motivation or use in combining Lea and Venkatraman, and such a combination does not teach the claimed invention herein. As such, rejection of Claim 5 should be withdrawn.

Claim 13 was rejected for the same reasons as Claim 4. The rejection of Claim 13 is respectfully traversed for the reasons given above in relation to Claim 4.

Claim 14 was rejected for the same reasons as Claim 5. The rejection of Claim 14 is respectfully traversed for the reasons given above in relation to Claim 5.

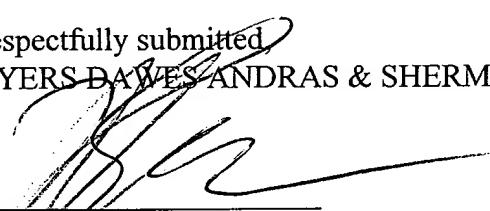
Claim 23 was rejected for the same reasons as Claim 13. The rejection of Claim 23 is respectfully traversed for the reasons given above in relation to Claim 13.

Claim 24 was rejected for the same reasons as Claim 14. The rejection of Claim 23 is respectfully traversed for the reasons given above in relation to Claim 14.

### Conclusion

Accordingly, Applicants respectfully request that the rejections of the claims be withdrawn, and the claims, be allowed for at least the aforementioned reasons. If it is believed that a telephone interview will help further the prosecution of this case, Applicants respectfully request that the undersigned attorney be contacted at the listed telephone number.

Respectfully submitted  
MYERS DAWES ANDRAS & SHERMAN

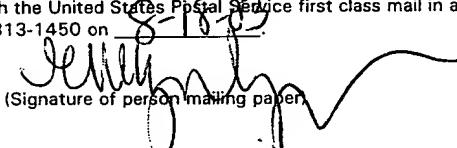
  
Kenneth L. Sherman  
Registration No. 33,783  
19900 MacArthur Blvd.  
Eleventh Floor  
Irvine, California 92612  
Telephone: (949) 223-9600  
Facsimile: (949) 223-9610

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